

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

GINA TORRESSO,

Plaintiff,

v.

PLS FINANCIAL SERVICES, INC.,

Defendant.

Case No. 1:15-cv-07577

**JOINT MOTION FOR SETTLEMENT APPROVAL**

Plaintiff Gina Torresso (“Torresso” or “Plaintiff”) and Defendant PLS FINANCIAL SERVICES, INC. (“PLS” or “Defendant”), by and through their respective counsel, jointly move the Court to approve the settlement agreed to by the parties and submitted to chambers for *in camera* review. In support of this Motion, the parties state as follows:

1. On August 28, 2015, Plaintiff filed her Complaint in this matter asserting overtime claims against her former employer PLS under the Fair Labor Standards Act, 29 U.S.C. §201, *et seq.* the Illinois Minimum Wage Law, 820 ILCS 115/1 *et seq.*, and the Illinois Wage Payment and Collection Act [ECF No. 1]. PLS filed an answer denying the substantive allegations on November 2, 2015. [ECF No. 6].
2. After arms-length negotiations and the exchange of substantive information, including written discovery, and with the Court’s assistance at a March 8, 2015 settlement conference, the parties herein have agreed to a compromise between them in order to avoid the expense, inconvenience, uncertainty and delay of further litigation.
3. When employees bring a private action against their former employer for alleged back wages under the FLSA, and the parties present to the district court a proposed settlement, the

district court may enter a stipulated judgment dismissing the case after scrutinizing the settlement to insure that it is a fair and reasonable resolution of a bona fide dispute over wages under the FLSA. *See Walton v. United Consumers Club, Inc.*, 786 F.2d 303, 306 (7<sup>th</sup> Cir. 1986); *Lynn's Food Stores v. United States*, 679 F.2d 1350, 1355 (11<sup>th</sup> Cir. 1982).

6. Submitted herewith to chambers, for *in camera* review by the Court, is the Settlement Agreement entered into between PLS and Plaintiff, as well as a draft Order Approving Settlement. The parties respectfully request that this Settlement Agreement not become part of the record in this case.

7. The parties further jointly request that the Court approve the Settlement Agreement because it is a fair and reasonable resolution of bona fide disputes over wages under the FLSA and the IMWL.

8. In addition, parties request that the Court dismiss this case with prejudice pursuant to the terms of the Settlement Agreement. The parties have also submitted a proposed order to that effect to the Court's proposed order inbox.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that this Court enter an Order approving the Settlement Agreement as a fair and reasonable resolution of bona fide disputes under the FLSA and the IMWL.

DATED: March 29, 2016.

Respectfully submitted,

By: /s/ Michael D. Ray  
One of the Attorneys for Defendant  
**PLS FINANCIAL SERVICES, INC.**

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on March 29, 2016, the foregoing *JOINT MOTION* was filed electronically with the Clerk of Court using the ECF system, which sent notification of such filing to:

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